

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

UNITED STATES OF AMERICA	*	CRIMINAL DOCKET NO. 09-242
V.	*	SECTION: "F" (5)
KAREN TURNER	*	
	* * *	

FACTUAL BASIS

_____ Should this matter have gone to trial, the government would have proven, through the introduction of competent testimony and admissible, tangible exhibits, the following facts, beyond a reasonable doubt, to support the allegations in the indictment now pending against the defendant:

The Defendant, **KAREN TURNER** (hereinafter "**TURNER**") has agreed to plead guilty as charged to the one-count bill of information charging her with theft of government funds, in violation of Title 18, United States Code, Section 641.

An official from the Federal Emergency Management Agency ("FEMA") would testify that FEMA is an agency of the government of the United States of America. As a result of Hurricane Katrina, FEMA provided financial assistance to eligible households to assist with needs for food, shelter and clothing. FEMA also provided financial assistance for vehicle loss up to \$4,500.00. One of the requirements for obtaining FEMA benefits was that the FEMA applicant was required to

assign to FEMA any insurance proceeds obtained for the same loss.

Additional testimony and evidence would show that prior to Hurricane Katrina, **TURNER** resided at 8300 I-10 Service Road, Building 20, Apt. 301, New Orleans, Louisiana in the Eastern District of Louisiana. During that same period, **TURNER** owned a 2000 Ford Contour, vehicle identification number (VIN) 3FAFP6637YM116031.

On August 29, 2005, Hurricane Katrina made land fall and impacted the entire Gulf Coast region including the area of **TURNER**'s residence in New Orleans, in the Eastern District of Louisiana. As a result of that damage, on or about August 30, 2005, **TURNER** applied for FEMA benefits, including a request for reimbursement for her Ford Contour which she claimed was destroyed in the storm. On or about September 16, 2006, **TURNER** filed a claim with State Farm Insurance Corporation for her Ford Contour which she claimed was destroyed in the storm. On or about February 2, 2006, **TURNER** received a check from State Farm in the amount of \$4,478.75 for the loss of the vehicle. An official from FEMA would testify that at no time did **TURNER** assign any of these proceeds to FEMA as required.

Further testimony and documentation would prove that during the same time that **TURNER**'s insurance claim was pending, her FEMA claim was pending as well. An official from FEMA would testify that **TURNER**'s FEMA claim for vehicle reimbursement was initially denied because FEMA determined that **TURNER** was eligible to obtain insurance proceeds for her vehicle. To appeal the denial of her FEMA claim, **TURNER** submitted to FEMA a fraudulent letter printed on State Farm letterhead stating that she received only \$255.59 from State Farm for the loss of her vehicle when in fact she received \$4,478.75 from State Farm for the loss of her vehicle. Based on this supplemental information **TURNER** provided to FEMA, on or about March 22, 2006, FEMA

authorized the transmission by wire from the Federal Reserve in Austin, Texas of \$4,244.41 to **TURNER**'s bank account at Hibernia (now Capital One) Bank in New Orleans, in the Eastern District of Louisiana. Authenticated documents and testimony would prove that the account into which the \$4,244.41 was deposited, specifically account number 2040651570, was an account owned by Turner. The \$4,244.41 represents the difference between the maximum amount payable by FEMA for vehicle reimbursement (\$4,500.00) and the amount **TURNER** claimed State Farm paid her (\$255.59). Testimony and exhibits would be presented to prove that after both the FEMA and State Farm claims were paid to **TURNER**, FEMA learned that **TURNER**'s vehicle was not damaged in Hurricane Katrina. The evidence would prove that **TURNER** was involved in an automobile accident in Auburn, Alabama on November 9, 2005, nearly three months after Hurricane Katrina made landfall, while driving her 2000 Ford Contour, VIN 3FAFP6637YM116031.

ANDRE' JONES
Assistant United States Attorney
LA Bar Roll No. 23502

Date

KAREN TURNER
Defendant

Date

VALERIE WELZ JUSSELIN
Attorney for the Defendant
LA Bar Roll No. 19825

Date